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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEBYOU SOLOMON, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; JOSEPH LOMBARDO,
individually and in his official capacity as
Sheriff; JOHN L. PELLETIER, an
individual; RICHARD E. MAUPIN, an
individual; RYAN J. FRYMAN, an
individual; JUAN D. CONTRERAS, an
individual; ALLEN J. PAVESE, an
individual; BRANDON M. MEADS, an
individual; DOES I – V, individuals,

Defendants.

Case. No.: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE
TO FILE RESPONSE TO
DISPOSITIVE MOTION**

(FOURTH REQUEST) [ECF No. 126]

Plaintiff NEBYOU SOLOMON, and Defendants LAS VEGAS METROPOLITAN
POLICE DEPARTMENT, JOSEPH LOMBARDO, JOHN L. PELLETIER, RICHARD E.
MAUPIN, RYAN J. FRYMAN, JUAN D. CONTRERAS, ALLEN J. PAVESE, and
BRANDON M. MEADS (collectively "Parties") by and through their respective counsel,
hereby stipulate to the following:

1. The Parties hereby agree and stipulate to that Plaintiff NEBYOU
SOLOMON shall have an additional sixteen (16) days to file his Response in Opposition to
LVMPD Defendants' Motion for Partial Summary Judgment (ECF No. 118) filed on October

18, 2021.

2. The current Response deadline is December 20, 2021 (*see* ECF No. 125), and the requested extension would make the new deadline be January 5, 2022.

3. This extension of time is necessary to ensure concise and appropriate briefing, which will in turn increase the likelihood that this case is decided on its merits rather than on a technicality.

4. Lead counsel for Plaintiff has continued to have medical issues as referenced in ECF Nos. 123 and 125, all of which have affected the dates and deadlines in several of lead counsel's cases.

5. Further, and in addition to the unexpected personnel changes referenced in ECF No. 125, counsel has incurred further personnel changes which affect the firm's efficiency. Specifically, the firm's long-time paralegal left the firm effective December 10, 2021. While lead counsel retained a new paralegal to begin working on December 15, 2021, this paralegal suffered a death in the family and has been unable to work since December 16, 2021.

6. The absence of a paralegal caused the firm attorneys to devote significant time to tasks which otherwise would have been performed more efficiently by paraprofessional staff.

7. Counsel for Plaintiff has also had several different competing deadlines, such as a deadline to file an anti-SLAPP motion to dismiss in state court on December 13, 2021, and a deadline to file a motion for attorney's fees and costs in a different anti-SLAPP matter in state court on December 15, 2021. Counsel for Plaintiff also has a number of upcoming deadlines.

8. This is the fourth stipulation for an extension of time in this matter.

9. The requested additional time to is ensure proper representation of the Parties' interests and quality briefing.¹

¹ The deadline to file motions for summary judgment was also previously extended.

10. This request is made in good faith and is not sought for any improper purpose or for the purpose of delay.

IT IS SO STIPULATED.

DATED this 20th day of December, 2021.

DATED this 20th day of December, 2021.

MCLETCHE LAW

MARQUIS AURBACH COFFING

/s/ Leo S. Wolpert

/s/ Nicholas D. Crosby

Margaret A. McLetchie, NBN 10931

Nicholas D. Crosby, NBN 8996

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Attorneys of Plaintiff Nebyou Solomon

Metropolitan Police Department; Joseph

Lombardo; John L. Pelletier; Richard E.

Maupin; Ryan J. Fryman; Juan D.

Contreras; Allen J. Pavese; and Brandon

M. Meads

ORDER

IT IS SO ORDERED.



U.S. DISTRICT COURT JUDGE

DATED: 12-29-21
